

## REMARKS/ARGUMENTS

In the Office Action mailed April 23, 2008, claims 1-8 were rejected. In response, Applicants hereby request reconsideration of the application in view of the amendments and the below-provided remarks.

For reference, claims 1-3 are amended. In particular, claim 1 is amended to include a limitation related to the subject matter recited in claim 4, which is canceled. Claims 1 and 2 are also amended to clarify the language of the claims. Claim 3 is amended to depend from claim 1.

### Objections to the Drawings

The current application is a U.S. National Stage application. The drawing requirements for U.S. National Stage applications are identified in MPEP 1825 and labeling of figures as "Prior Art" is not required (see PCT Rule 11.11). Further, MPEP 1893.03(f) states that "[t]he USPTO may not impose requirements beyond those imposed by the Patent Cooperation Treaty (e.g., PCT Rule 11)." In view of the above, Applicants respectfully assert that labeling Figure 1 as "Prior Art" is not required in the current application.

### Claim Rejections under 35 U.S.C. 102

Claims 1-8 were rejected under 35 U.S.C. 102(e) as being anticipated by Dutta et al. (U.S. Pat. No. 6,963,890, hereinafter Dutta), Johnson (U.S. Pat. No. 6,889,238, hereinafter Johnson), and Dujardin et al. (U.S. Pat. No. 6,308,191, hereinafter Dujardin). However, Applicants respectfully submit that these claims are patentable over Dutta, Johnson, and Dujardin for the reasons provided below.

### Independent Claim 1

Claim 1 recites "at least a first functional unit to perform a n-taps polyphase filtering and a second functional unit to perform a m-taps polyphase filtering, m and n being integers greater than or equal to two, wherein the functional units are able to

receive in parallel data and coefficients coming from the memory device, and to calculate results from said data and coefficients and supply these results back to the memory device” (emphasis added). Claim 1 also recites “a crossbar to perform a transfer of the data, coefficients, and results between the memory device and any functional unit or any combination of functional units” (emphasis added).

#### Dutta Does Not Disclose Supplying Results Back to a Memory Device

Dutta does not disclose supplying results back to a memory device, as recited in the claim. Dutta merely discloses a single linear shift register. Dutta also discloses a XBAR memory to interconnect the external memories. Dutta, col. 9, lines 1-3. However, Dutta does not disclose feedback to any type of memory element for various n-taps and m-taps types of polyphase filtering configurations. Moreover, although Dutta discloses mode selection circuitry adapted to switch the digital filter between multiple filtering modes, Dutta nevertheless does not disclose a switch to perform a transfer of data, coefficients, and results between a memory device and one or more functional units.

In sum, Dutta does not disclose all of the limitations of the claim because Dutta does not disclose supplying results from a functional unit back to a memory device as recited in the claim. Accordingly, Applicants respectfully assert that claim 1 is patentable over Dutta because Dutta does not disclose all of the limitations of the claim.

#### Johnson Does Not Disclose Supplying Results Back to a Memory Device

Johnson does not disclose supplying results back to a memory device, as recited in the claim. Johnson merely discloses a shift register. Johnson, col. 2, lines 41-53. However, Johnson does not disclose feedback to any type of memory element for various n-taps and m-taps types of polyphase filtering configurations. Moreover, although Johnson discloses a commutator to input data to a polyphase filter, Johnson nevertheless does not disclose a switch to perform a transfer of data, coefficients, and results between a memory device and one or more functional units.

In sum, Johnson does not disclose all of the limitations of the claim because Johnson does not disclose supplying results from a functional unit back to a memory device as recited in the claim. Accordingly, Applicants respectfully assert claim 1 is

patentable over Johnson because Johnson does not disclose all of the limitations of the claim.

#### Dujardin Does Not Disclose a Transfer of Data, Coefficients, and Results

Dujardin does not disclose a transfer of data, coefficients, and results, as recited in the claim. Dujardin merely discloses a reorganization block within a filter processor element which provides a means of reorganizing input data and applying the input data to the operating part. Dujardin, col. 2, lines 48-57. Moreover, although Dujardin discloses a means of reorganizing input data to the operating part, Dujardin nevertheless does not disclose a switch to perform a transfer of data, coefficients, and results between a memory device and one or more functional units.

In sum, Dujardin does not disclose all of the limitations of the claim because Dujardin does not disclose transferring data, coefficients, and results between a memory device and one or more a functional units, as recited in the claim. Accordingly, Applicants respectfully assert claim 1 is patentable over Dujardin because Dujardin does not disclose all of the limitations of the claim.

#### Dependent Claims

Claims 2, 3, and 5-8 depend from and incorporate all of the limitations of independent claim 1. Applicants respectfully assert that claims 2, 3, and 5-8 are allowable based on an allowable base claim. Additionally, each of claims 2, 3, and 5-8 may be allowable for further reasons.

## **CONCLUSION**

Applicants respectfully request reconsideration of the claims in view of the amendments and remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,

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